

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

CASE NO: 9:22-cv-81657-RAR

JOAN TANOFSKY, and all others similarly
situated pursuant to 29 U.S.C. 216(b),

Plaintiff(s),
v.

AMERICAN PROTECTION PLANS,
LLC d/b/a AMERICAN RESIDENTIAL
WARRANTY,

Defendant.

_____ /

JOINT NOTICE OF COLLECTIVE SETTLEMENT

Plaintiff, JOAN TANOFSKY, and Defendant, AMERICAN PROTECTION PLANS LLC d/b/a AMERICAN RESIDENTIAL WARRANTY, by and through undersigned counsel, hereby notify the Court that the Parties have fully resolved all claims set forth within Plaintiff's operative Collective Action Complaint for Damages and Demand for Jury Trial. The FLSA claims in this case have been settled on a collective-wide basis. Within ten (10) days from the filing of this notice, the Parties agree to file a *Joint* Motion for Court Approval of Collective Settlement, and supporting documentation, for the Court's review.

Date: May 26, 2023

Respectfully Submitted,

**USA EMPLOYMENT LAWYERS –
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By: /s/ Justin Kaplan
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was filed via CM/ECF on this 26th
day of May 2023.

By: /s/ Jordan Richards, Esquire
JORDAN RICHARDS, ESQUIRE
Florida Bar No. 108372

SERVICE LIST:

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